

STATISTICAL INFORMATION ONLY: Debtor must select the number of each of the following items included in the Plan.

Valuation of Security Assumption of Executory Contract or unexpired Lease Lien Avoidance

Last revised: November 14, 2023

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

Carolyn Brooks,
Debtor

Case No.:

22-15547

Judge:

CMG

Debtor(s)

Chapter 13 Plan and Motions

☐ Original

☒ Modified/Notice Required

Date: 3/6/2025

☐ Motions Included

☐ Modified/No Notice Required

THE DEBTOR HAS FILED FOR RELIEF UNDER
CHAPTER 13 OF THE BANKRUPTCY CODE

YOUR RIGHTS WILL BE AFFECTED

The Court issued a separate Notice of the Hearing on Confirmation of Plan, which contains the date of the confirmation hearing on the Plan proposed by the Debtor. This document is the actual Plan proposed by the Debtor to adjust debts. You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this Plan or any motion included in it must file a written objection within the time frame stated in the Notice. Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the Notice. The Court may confirm this plan, if there are no timely filed objections, without further notice. See Bankruptcy Rule 3015. If this plan includes motions to avoid or modify a lien, the lien avoidance or modification may take place solely within the Chapter 13 confirmation process. The plan confirmation order alone will avoid or modify the lien. The debtor need not file a separate motion or adversary proceeding to avoid or modify a lien based on value of the collateral or to reduce the interest rate. An affected lien creditor who wishes to contest said treatment must file a timely objection and appear at the confirmation hearing to prosecute same.

The following matters may be of particular importance. Debtors must check one box on each line to state whether the plan includes each of the following items. If an item is checked as "Does Not" or if both boxes are checked, the provision will be ineffective if set out later in the plan.

THIS PLAN:

☐ DOES ☒ DOES NOT CONTAIN NON-STANDARD PROVISIONS. NON-STANDARD PROVISIONS MUST ALSO BE SET FORTH IN PART 10.

☐ DOES ☒ DOES NOT LIMIT THE AMOUNT OF A SECURED CLAIM BASED SOLELY ON VALUE OF COLLATERAL, WHICH MAY RESULT IN A PARTIAL PAYMENT OR NO PAYMENT AT ALL TO THE SECURED CREDITOR. SEE MOTIONS SET FORTH IN PART 7, IF ANY, AND SPECIFY: ☐ 7a / ☐ 7b / ☐ 7 c.

☐ DOES ☒ DOES NOT AVOID A JUDICIAL LIEN OR NONPOSSESSORY, NONPURCHASE-MONEY SECURITY INTEREST. SEE MOTIONS SET FORTH IN PART 7, IF ANY, AND SPECIFY: ☐ 7a / ☐ 7b / ☐ 7 c.

Initial Debtor(s)' Attorney: /s/ JEJ Initial Debtor: /s/ CB Initial Co-Debtor: _____

Part 1: Payment and Length of Plan

a. The debtor shall pay to the Chapter 13 Trustee \$ _____*_____ monthly for _____ months starting on the first of the month following the filing of the petition. (If tier payments are proposed) : and then \$ _____ per month for _____ months; \$ _____ per month for _____ months, for a total of _____ months.

b. The debtor shall make plan payments to the Trustee from the following sources:

☒ Future earnings

☐ Other sources of funding (describe source, amount and date when funds are available):

* \$1,264 PTD through 12/22 then \$320 x 20 months then \$385 x 23 months. (\$2,693 pre-petition arrears paid to Rocket Mortgage by ERMA)

c. Use of real property to satisfy plan obligations:

☐ Sale of real property

Description:

Proposed date for completion: _____

☐ Refinance of real property:

Description:

Proposed date for completion: _____

☐ Loan modification with respect to mortgage encumbering real property:

Description:

Proposed date for completion: _____

d. ☐ The regular monthly mortgage payment will continue pending the sale, refinance or loan modification. See also Part 4.

☐ If a Creditor filed a claim for arrearages, the arrearages ☐ will / ☐ will not be paid by the Chapter 13

Trustee pending an Order approving sale, refinance, or loan modification of the real property.

e. For debtors filing joint petition:

☐ Debtors propose to have the within Chapter 13 Case jointly administered. If any party objects to joint administration, an objection to confirmation must be timely filed. The objecting party must appear at confirmation to prosecute their objection.

Initial Debtor: _____/s/ CB Initial Co-Debtor: _____

Part 2: Adequate Protection ☒ NONE

a. Adequate protection payments will be made in the amount of \$ _____ to be paid to the Chapter 13 Trustee and disbursed pre-confirmation to _____ (creditor). (Adequate protection payments to be commenced upon order of the Court.)

b. Adequate protection payments will be made in the amount of \$ _____ to be paid directly by the debtor(s), pre-confirmation to: _____ (creditor).

Part 3: Priority Claims (Including Administrative Expenses)

a. All allowed priority claims will be paid in full unless the creditor agrees otherwise:

Name of Creditor	Type of Priority	Amount to be Paid
CHAPTER 13 STANDING TRUSTEE	ADMINISTRATIVE	AS ALLOWED BY STATUTE
ATTORNEY FEE BALANCE	ADMINISTRATIVE	BALANCE DUE: \$ 750 Established additional fees subject to court approval
DOMESTIC SUPPORT OBLIGATION		
IRS	Taxes or penalties owed to governmental units	\$600.00

b. Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount:

Check one:

☒ None

☐ The allowed priority claims listed below are based on a domestic support obligation that has been assigned to or is owed to a governmental unit and will be paid less than the full amount of the claim pursuant to 11 U.S.C.1322(a)(4):

Name of Creditor	Type of Priority	Claim Amount	Amount to be Paid
	Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount.		

Part 4: Secured Claims

a. Curing Default and Maintaining Payments on Principal Residence: ☒ NONE

The Debtor will pay to the Trustee allowed claims for arrearages on monthly obligations and the debtor shall pay directly to the creditor monthly obligations due after the bankruptcy filing as follows:

Name of Creditor	Collateral or Type of Debt (identify property and add street address, if applicable)	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor by Trustee	Regular Monthly Payment Direct to Creditor
					Debtor shall pay the regular monthly payment pursuant to the terms of the underlying loan documents unless otherwise ordered.

b. Curing and Maintaining Payments on Non-Principal Residence & other loans or rent arrears: ☒ NONE

The Debtor will pay to the Trustee allowed claims for arrearages on monthly obligations and the debtor will pay directly to the creditor monthly obligations due after the bankruptcy filing as follows:

Name of Creditor	Collateral or Type of Debt (identify property and add street address, if applicable)	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor by Trustee	Regular Monthly Payment Direct to Creditor
					Debtor shall pay the regular monthly payment pursuant to the terms of the underlying loan documents unless otherwise ordered.

e. Surrender ☒ NONE

Upon confirmation, the automatic stay is terminated as to surrendered collateral only under 11 U.S.C. 362(a) and that the stay under 11 U.S.C 1301 shall be terminated in all respects. The Debtor surrenders the following collateral:

Name of Creditor	Collateral to be Surrendered (identify property and add street address, if applicable)	Value of Surrendered Collateral	Remaining Unsecured Debt

f. Secured Claims Unaffected by the Plan ☐ NONE

The following secured claims are unaffected by the Plan:

Name of Creditor	Collateral (identify property and add street address, if applicable)
Rocket Mortgage Credit Union of New Jersey	

g. Secured Claims to be Paid in Full Through the Plan: ☒ NONE

Name of Creditor	Collateral (identify property and add street address, if applicable)	Amount	Interest Rate	Total Amount to be Paid through the plan by Trustee

Part 5: Unsecured Claims ☐ NONE

a. Not separately classified allowed non-priority unsecured claims shall be paid:

☒ Not less than \$ 0.00 to be distributed *pro rata*

☐ Not less than _____ percent

☐ *Pro Rata* distribution from any remaining funds

b. Separately classified unsecured claims shall be treated as follows:

Name of Creditor	Basis For Separate Classification	Treatment	Amount to be Paid by Trustee
OneMain	Co-signer	100%	\$9,000.00

Part 6: Executory Contracts and Unexpired Leases ☒ NONE

(NOTE: See time limitations set forth in 11 U.S.C. 365(d)(4) that may prevent assumption of non-residential real property leases in this Plan.)

All executory contracts and unexpired leases, not previously rejected by operation of law, are rejected, except the following, which are assumed:

Name of Creditor	Arrears to be Cured and paid by Trustee	Nature of Contract or Lease	Treatment by Debtor	Post-Petition Payment to be Paid Directly to Creditor by Debtor

Part 7: Motions ☒ NONE

NOTE: All plans containing motions must be served on all affected lienholders, together with local form, Notice of Chapter 13 Plan Transmittal, within the time and in the manner set forth in D.N.J. LBR 3015-1. A Certification of Service, Notice of Chapter 13 Plan Transmittal, and valuation must be filed with the Clerk of Court when the plan and transmittal notice are served

a. Motion to Avoid Liens Under 11. U.S.C. Section 522(f). ☒ NONE

The Debtor moves to avoid the following liens that impair exemptions:

Name of Creditor	Nature of Collateral (identify property and add street address, if applicable)	Type of Lien	Amount of Lien	Value of Collateral	Amount of Claimed Exemption	Sum of All Other Liens Against the Property	Amount of Lien to be Avoided

b. Motion to Avoid Liens and Reclassify Claim From Secured to Completely Unsecured. ☒ NONE

The Debtor moves to reclassify the following claims as unsecured and to void liens on collateral consistent with Part 4 above:

Name of Creditor	Collateral (identify property and add street address if applicable)	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor's Interest in Collateral	Total Amount of Lien to be Reclassified

c. Motion to Partially Void Liens and Reclassify Underlying Claims as Partially Secured and Partially Unsecured. ☒ NONE

The Debtor moves to reclassify the following claims as partially secured and partially unsecured, and to void liens on collateral consistent with Part 4 above:

Name of Creditor	Collateral (identify property and add street address, if applicable)	Scheduled Debt	Total Collateral Value	Amount to be Deemed Secured	Amount to be Reclassified as Unsecured

d. Where the Debtor retains collateral, upon completion of the Plan and issuance of the Discharge, affected Debtor may take all steps necessary to remove of record any lien or portion of any lien discharged.

Part 8: Other Plan Provisions

a. Vesting of Property of the Estate

- ☒ Upon confirmation
☐ Upon discharge

b. Payment Notices

Creditors and Lessors provided for in Parts 4, 6 or 7 may continue to mail customary notices or coupons to the Debtor notwithstanding the automatic stay.

c. Order of Distribution

The Trustee shall pay allowed claims in the following order:

- 1) Chapter 13 Standing Trustee Fees, upon receipt of funds
- 2) Jenkins Law Group
- 3) IRS
- 4) OneMain Financial
- 5) _____
- 6) _____

d. Post-Petition Claims

The Trustee ☐ is, ☒ is not authorized to pay post-petition claims filed pursuant to 11 U.S.C. Section 1305(a) in the amount filed by the post-petition claimant.

Part 9: Modification ☐ NONE

NOTE: Modification of a plan does not require that a separate motion be filed. A modified plan must be served in accordance with D.N.J. LBR 3015-2.

If this Plan modifies a Plan previously filed in this case, complete the information below.

Date of Plan being Modified: 3/6/2025.

Explain below **why** the plan is being modified:
To modify monthly payments and priority claims.

Are Schedules I and J being filed simultaneously with this Modified Plan?

☐ Yes

☒ No

Part 10: Non-Standard Provision(s):

Non-Standard Provisions:

☒ NONE

☐ Explain here:

Any non-standard provisions placed elsewhere in this plan are ineffective.

Signatures

The Debtor(s) and the attorney for the Debtor (if any) must sign this Plan.

By signing and filing this document, the debtor(s), if not represented by an attorney, or the attorney for the debtor(s) certify that the wording and order of the provisions in this Chapter 13 Plan are identical to Local Form, *Chapter 13 Plan and Motions*.

I certify under penalty of perjury that the above is true.

Date: 3/6/2025

/s/ Carolyn Brooks
Debtor

Date: _____

Joint Debtor

Date: 3/6/2025

/s/ Jeffrey E. Jenkins
Attorney for the Debtor(s)

In re:
Carolyn L Brooks
Debtor

Case No. 22-15547-CMG
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-3

User: admin

Page 1 of 3

Date Rcvd: Mar 10, 2025

Form ID: pdf901

Total Noticed: 32

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
^	Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 12, 2025:

Recip ID	Recipient Name and Address
db	+ Carolyn L Brooks, 249 Hillcrest Ave., Trenton, NJ 08618-3409
519657391	+ American Web Loan, 2128 N 14th St STE 1, Ponca City OK 74601-1831
519657392	+ Ayla Brooks, 249 Hillcrest Ave, Trenton NJ 08618-3409
519657397	+ Helix, 11225 College Blvd Suite 150, Overland Park KS 66210-2771
519657401	+ Leon Brooks, 249 Hillcrest Ave, Trenton NJ 08618-3409
519657403	+ Rocket Mortgage, 1050 Woodward Avenue, Detroit MI 48226-3573
519675281	+ Rocket Mortgage, LLC f/k/a Quicken Loans, at. el, 635 Woodward Avenue, Detroit MI 48226-3408

TOTAL: 7

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
smg	Email/Text: usanj.njbankr@usdoj.gov	Mar 10 2025 21:10:00	U.S. Attorney, 970 Broad St., Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534
smg	+ Email/Text: ustpreion03.ne.ecf@usdoj.gov	Mar 10 2025 21:10:00	United States Trustee, Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100, Newark, NJ 07102-5235
cr	Email/Text: bankruptcy@cnj.org	Mar 10 2025 21:10:00	Credit Union of NJ, 1301 Parkway Avenue, PO Box 7921, Ewing, NJ 08628
519657393	+ Email/PDF: Citi.BNC.Correspondence@citi.com	Mar 10 2025 21:15:21	BEST BUY CBNA, PO BOX 6497, Sioux Falls SD 57117-6497
519657395	+ Email/Text: bankruptcy@cnj.org	Mar 10 2025 21:10:00	CREDIT UNION OF N J, PO BOX 7921, Trenton NJ 08628-0921
519672974	Email/Text: bankruptcy@cnj.org	Mar 10 2025 21:10:00	Credit Union of New Jersey, Attn: Risk Mitigation Department, P.O. Box 7921, Ewing, N.J. 08628
519657394	+ Email/PDF: AIS.cocard.ebn@aisinfo.com	Mar 10 2025 21:16:02	Capital One, PO Box 31293, Salt Lake City UT 84131-0293
519701371	Email/PDF: Citi.BNC.Correspondence@citi.com	Mar 10 2025 21:31:45	Citibank, N.A., 5800 S Corporate Pl, Sioux Falls, SD 57108-5027
519657396	+ Email/Text: mrdiscen@discover.com	Mar 10 2025 21:08:00	Discover Bank, PO BOX 30939, Salt Lake City UT 84130-0939
519662092	Email/Text: mrdiscen@discover.com	Mar 10 2025 21:08:00	Discover Bank, Discover Products Inc, PO Box 3025, New Albany, OH 43054-3025
519657398	+ Email/Text: sbse.cio.bnc.mail@irs.gov	Mar 10 2025 21:09:00	IRS, PO Box 7346, Philadelphia PA 19101-7346
520257543	Email/Text: JCAP_BNC_Notices@jcap.com	Mar 10 2025 21:10:00	JEFFERSON CAPITAL SYSTEMS LLC, PO Box 7999, St Cloud MN 56302
520257544	Email/Text: JCAP_BNC_Notices@jcap.com	Mar 10 2025 21:10:00	JEFFERSON CAPITAL SYSTEMS LLC, PO Box 7999, St Cloud MN 56302, JEFFERSON CAPITAL SYSTEMS LLC, PO Box 7999, St

District/off: 0312-3

User: admin

Page 2 of 3

Date Rcvd: Mar 10, 2025

Form ID: pdf901

Total Noticed: 32

			Cloud MN 56302
519657400	+ Email/PDF: ais.chase.ebn@aisinfo.com	Mar 10 2025 21:32:11	JPMCB Card Services, PO Box 15369, Wilmington DE 19850-5369
519657399	+ Email/Text: mail@jenkinsclayman.com	Mar 10 2025 21:09:00	Jenkins Clayman, 412 S Whitehorse Pike, Audubon NJ 08106-1311
519681880	Email/PDF: resurgentbknotifications@resurgent.com	Mar 10 2025 21:32:09	LVNV Funding, LLC, Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587
519671814	+ Email/PDF: cbp@omf.com	Mar 10 2025 21:15:01	OneMain Financial Group, LLC, PO Box 3251, Evansville, IN 47731-3251
519657402	+ Email/PDF: cbp@omf.com	Mar 10 2025 22:00:17	Onemain, PO Box 1010, Evansville IN 47706-1010
519657404	+ Email/PDF: ais.sync.ebn@aisinfo.com	Mar 10 2025 21:15:15	SyncBAamazon, PO Box 960013, Orlando FL 32896-0013
519657405	+ Email/PDF: ais.sync.ebn@aisinfo.com	Mar 10 2025 21:16:22	SyncBCare Credit, PO Box 965036, Orlando FL 32896-5036
519657406	+ Email/PDF: ais.sync.ebn@aisinfo.com	Mar 10 2025 21:32:23	SyncBPPC, PO Box 530975, Orlando FL 32896-0001
519657407	+ Email/PDF: ais.sync.ebn@aisinfo.com	Mar 10 2025 21:15:27	SyncBPPMC, PO BOX 965005, Orlando FL 32896-5005
519658661	^ MEBN	Mar 10 2025 20:58:21	Synchrony Bank, c/o of PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021
519706025	+ Email/PDF: ebn_ais@aisinfo.com	Mar 10 2025 21:16:30	Verizon, by American InfoSource as agent, 4515 N Santa Fe Ave, Oklahoma City, OK 73118-7901
519657408	+ Email/PDF: BankruptcynoticesCCSBKOperations@wellsfargo.com	Mar 11 2025 02:31:39	Wells Fargo, PO Box 51193, Los Angeles CA 90051-5493

TOTAL: 25

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Mar 12, 2025

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 10, 2025 at the address(es) listed below:

Name	Email Address
------	---------------

Albert Russo	
--------------	--

District/off: 0312-3

User: admin

Page 3 of 3

Date Rcvd: Mar 10, 2025

Form ID: pdf901

Total Noticed: 32

on behalf of Trustee Albert Russo docs@russotrustee.com

Albert Russo

docs@russotrustee.com

Denise E. Carlon

on behalf of Creditor Rocket Mortgage LLC f/k/a Quicken Loans, LLC dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com

Jeffrey E. Jenkins

on behalf of Debtor Carolyn L Brooks mail@jjenkinslawgroup.com JenkinsClayman@jubileebk.net

Jeffrey E. Jenkins

on behalf of Trustee Albert Russo mail@jjenkinslawgroup.com JenkinsClayman@jubileebk.net

Michael R. DuPont

on behalf of Creditor Credit Union of NJ dupont@redbanklaw.com lori@redbanklaw.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 7